



# United Steelworkers of America

AFL-CIO/CLC

815 16th Street, N.W.  
Washington, D.C. 20006

(202) 638-6929 • FAX (202) 347 6735

George Becker *International President*  
Leo W. Gerard *International Secretary-Treasurer*  
Richard H. Davis *International Vice President/Administration*  
Leon Lynch *International Vice President/Human Affairs*

Jack Sheehan, *Director, Legislative Department*

April 23, 1996

Ms. Jennifer K. Wall  
Reports Analyst  
Reports Analyst Division  
Federal Election Commission  
999 E Street, NW  
Washington, DC 20463

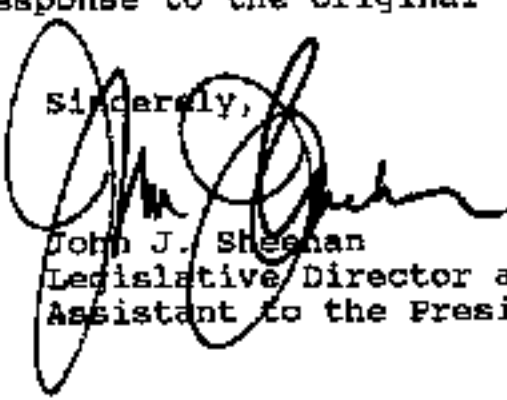
RE: Democrats 2000

Dear Ms. Wall:

I am resubmitting our letter to you of April 4, 1996 in response to FEC's March 29, 1996 inquiry regarding a \$4000 contribution to Democrats 2000 that was erroneously reported as a PAC contribution. The \$4000 was for tickets to a dinner hosted by Democrats 2000.

We have received a letter dated April 18, 1996 that the FEC has not yet received our response to the original inquiry.

Sincerely,

  
John J. Sheehan  
Legislative Director and  
Assistant to the President

**Enclosure**

4-4-96 letter to Jennifer Wall  
with enclosures  
4-18-96 letter from J.D. Gibson, FEC  
cc: John D. Gibson, Asst Staff Dir.  
FEC Reports Analysis Division

APR 25 9 01 AM '96  
FEDERAL ELECTION  
COMMISSION  
MAY 1 1996



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Jack Sheehan, Director/Legislative Department

April 4, 1996

Ms. Jennifer K. Wall  
Reports Analyst  
Reports Analyst Division  
Federal Election Commission  
Washington, DC 20463

Dear Ms. Wall:

Relative to your inquiry of March 29, 1996 regarding a \$4000 contribution to Democrats 2000 from the United Steelworkers of America (USWA), please be advised that the contribution was erroneously recorded by Democrats 2000 as a PAC contribution.

Democrats 2000 will be submitting an amended report demonstrating such. That organization has also indicated to me that the contribution, which was for participation in a dinner, was originally deposited in its non-Federal account.

Sincerely,

  
John J. Sheehan  
Legislative Director and  
Assistant to the President

cc: Tom Hattery, Democrats 2000

96030474460



# FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MS-F

Treasurer

USWA

816 16th Street, Ste. 706  
Washington, DC 20006

MAR 22 1996

Dear Treasurer:

This letter is prompted by the Commission's interest in assisting committees which may be subject to the registration and reporting requirements of the Federal Election Campaign Act ("the Act") but are not registered with the Commission.

The Act defines a "political committee" to include any separate segregated fund established by a corporation, labor organization, membership organization (to include trade associations), cooperative, or corporation without capital stock which solicits contributions or makes expenditures for the purpose of influencing federal elections. 2 U.S.C. §§431(4) and 441b

A review of the receipts reported by the Democrats 2000 indicates that your organization may be a separate segregated fund making expenditures to influence federal elections. The term "expenditures" includes contributions to federal candidates and committees supporting federal candidates. See 2 U.S.C. §431(9). This activity may qualify your organization as a "political committee" subject to the registration, reporting and other requirements of the Act. A copy of the receipt schedule(s) which list your organization's contribution(s) is enclosed for your review.

In order to be in compliance with the Act, your organization must either:

- 1) submit a Statement of Organization and file disclosure reports on FEC FORM 3X (relevant informational materials and forms are enclosed); or
- 2) receive a full contribution refund or direct the recipient committee(s) to transfer the funds to an account not used to influence federal elections.

The second alternative noted above should be followed if your organization does not wish to register and file disclosure reports or if the contributions or expenditures by your organization were from an account containing corporate or union funds.

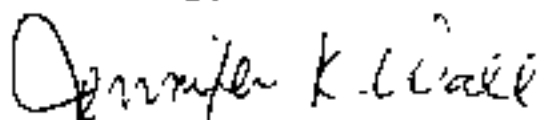
Celebrating the Civil  
YESTERDAY, TO  
DEDICATED TO KEEP

Post-It Fax Note 7871		Date 4/1/96	# of pages 3
To	Tom Haffey	From	Jack Shuck
Co./Dept.		Co.	
Phone #	Per our conversation	Phone #	
Fax #		Fax #	

If you believe that your organization is not a political committee, or the Commission is otherwise in error, please submit documentation which will clarify this matter. Although the Commission may take further legal steps concerning this matter, your prompt action will be taken into consideration.

Please notify the Commission within fifteen (15) days from the date of this letter of your decision on this matter. If you have any questions, please contact me on the agency's toll-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,



Jennifer K. Wall  
Reports Analyst  
Reports Analysis Division

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Enclosures

9 5 0 3 0 4 7 4 4 2

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

DEMOCRATS 2000

C00230342

FORM NO. 100-100

11c

<b>A. Full Name, Mailing Address and ZIP Code</b> IBEW 1125 15th St Washington DC 20005	<b>Name of Employer</b> PAC	<b>Date (month, day, year)</b> 11/9/95	<b>Amount of Each Receipt this Period</b> 5000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 5000.00	
<b>B. Full Name, Mailing Address and ZIP Code</b> Master Mates and Pilots 1775 X St NW Ste 2000 Washington DC 20006	<b>Name of Employer</b> PAC	<b>Date (month, day, year)</b> 11/17/95	<b>Amount of Each Receipt this Period</b> 5000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 5000.00	
<b>C. Full Name, Mailing Address and ZIP Code</b> Nat'l Council of Senior Citizens 1331 F St NW Washington DC 20004	<b>Name of Employer</b> PAC	<b>Date (month, day, year)</b> 11/28/95	<b>Amount of Each Receipt this Period</b> 250.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 250.00	
<b>D. Full Name, Mailing Address and ZIP Code</b> Firefighters 1750 New York Ave Washington DC 20006	<b>Name of Employer</b> PAC	<b>Date (month, day, year)</b> 11/30/95	<b>Amount of Each Receipt this Period</b> 5000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 5000.00	
<b>E. Full Name, Mailing Address and ZIP Code</b> USWA 916 16th St Ste 706 Washington DC 20006	<b>Name of Employer</b> PAC	<b>Date (month, day, year)</b> 11/30/95	<b>Amount of Each Receipt this Period</b> 4000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 4000.00	
<b>F. Full Name, Mailing Address and ZIP Code</b> Ogilvy Adams and Rinehart	<b>Name of Employer</b> PAC	<b>Date (month, day, year)</b> 12/1/95	<b>Amount of Each Receipt this Period</b> 500.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 500.00	
<b>G. Full Name, Mailing Address and ZIP Code</b> Building and Constr Trades 815 16th St Washington DC 20005	<b>Name of Employer</b> PAC	<b>Date (month, day, year)</b> 12/6/95	<b>Amount of Each Receipt this Period</b> 1000.00
<b>Receipt For:</b> <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	<b>Occupation</b>	<b>Aggregate Year-to-Date</b> > \$ 1000.00	

SUBTOTAL of Receipts This Page (optional)

20,750.00

TOTAL This Period (last page this line number only)



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

April 18, 1996

USWA

APR 22 1996

LEGIS. DEPT.

Treasurer  
USWA  
816 16th Street, Suite 706  
Washington, DC 20006

Dear Treasurer:

This is to inform you that as of this date, the Commission has not received your response to our letter dated March 29, 1996. Our letter notified you that a review of reports filed with the Commission indicates that your organization may have made expenditures which qualify it as a political committee. Enclosed is a copy of our original letter.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate legal action to ensure compliance with the Act.

If you should have any questions related to this matter, please contact Jennifer Wall on our toll-free number (800) 424-9530 or our local number (202) 219-3580.

Sincerely,

John D. Gibson  
Assistant Staff Director  
Reports Analysis Division

Enclosure

*Celebrating the Commission's 20th Anniversary*

YESTERDAY, TODAY AND TOMORROW  
DEDICATED TO KEEPING THE PUBLIC INFORMED

2 3 0 3 0 2 7 4 4 5 4

**Federal Election Commission**  
**ENVELOPE REPLACEMENT PAGE**  
**FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

☐ Hand Delivered

DATE OF RECEIPT

☒ First Class Mail

POSTMARKED

4-23-96

☐ Registered/Certified Mail

POSTMARKED

☐ No Postmark

☐ Postmark Illegible

☐ Received from the House Office of Records  
and Registration

DATE OF RECEIPT

☐ Received from the Senate Office of Public  
Records

DATE OF RECEIPT

☐ Other (Specify):

POSTMARKED

and/or DATE OF RECEIPT

JmH  
PREPARER

4-25-96  
DATE PREPARED